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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**
10

11 WAYMO, LLC,

12 Plaintiff,

13 vs.

14 UBER TECHNOLOGIES, INC;
15 OTTOMOTTO LLC; and OTTO TRUCKING
LLC,

16 Defendants.
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Case No.: 3:17-CV-00939 (WHA)

**DECLARATION OF JONATHAN
PATCHEN IN SUPPORT OF NON-
PARTY LIOR RON'S OPPOSITION TO
WAYMO'S BRIEF RE: DILIGENCED
EMPLOYEES' WAIVER OF ATTORNEY-
CLIENT PRIVILEGE**

Honorable William Alsup

1 I, JONATHAN PATCHEN, declare as follows:

2 1. I am a partner in the law offices of Taylor & Patchen, LLP, a member in good
3 standing of the bar of the State of California, and am admitted to practice before the United States
4 District Court for the Northern District of California. I have personal knowledge of the matters set
5 forth in this declaration, and if called upon to testify as a witness in this case, I could and would
6 testify competently under oath to all of the matters set forth in this declaration. This declaration is
7 submitted in support of Non-Party Lior Ron's Letter Brief in Opposition to Waymo's Letter Brief
8 re: Diligenced Employees' Waiver of Attorney-Client Privilege filed concurrently herewith.

9 2. Attached hereto as Exhibit A is a true and correct copy of an excerpted transcript
10 from the September 14, 2017 hearing before Judge Corley.

11 3. Attached hereto as Exhibit B is a true and correct copy of an August 8, 2017 e-mail
12 from myself to Special Master Cooper regarding Mr. Ron's Motion to Quash.

13 4. Attached hereto as Exhibit C is a true and correct copy of a September 15, 2017
14 e-mail from Stefanie Chow, a Case Assistant at Taylor & Patchen, LLP, serving Mr. Ron's
15 privilege log.

16 I declare under penalty of perjury, under the laws of the United States of America, that the
17 foregoing is true and correct. Executed this 25th day of September, 2017, at San Francisco,
18 California.

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20 /s/ Jonathan A. Patchen
21 JONATHAN A. PATCHEN
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